

EXHIBIT C

(Deposition Transcript of Lamont Satchel)

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1 IN THE UNITED STATES BANKRUPTCY COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4
5 In re Chapter 9
6 CITY OF DETROIT, MICHIGAN, Case No. 13-53846
7 Debtor. Hon. Steven W. Rhodes
8 _____
9
10 DEONENT: LAMONT SATCHEL
11 DATE: Thursday, September 19, 2013
12 TIME: 11:00 a.m.
13 LOCATION: MILLER CANFIELD PADDOCK & STONE PLC
14 150 West Jefferson, Suite 2500
15 Detroit, Michigan
16 REPORTER: Jeanette M. Fallon, CRR/RMR/CSR-3267
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<p>1 here?</p> <p>2 A. Not without reading it.</p> <p>3 Q. Okay, well, let me just see if I can quickly refresh</p> <p>4 you. If you look on page 4 under what I have</p> <p>5 suggested to you was the projections as to what would</p> <p>6 happen without restructuring according to the City,</p> <p>7 you'll see there are some line items that are entitled</p> <p>8 pension contributions and there are three subpoints,</p> <p>9 public safety, nonpublic safety and DDOT; do you see</p> <p>10 that?</p> <p>11 A. On page 4?</p> <p>12 Q. On page 4.</p> <p>13 A. Uh-huh.</p> <p>14 Q. Okay, and if you look just for exemplary purposes to</p> <p>15 the column for year 2014, you see there are entries of</p> <p>16 139 million, 36.9 million and 23.6 million?</p> <p>17 A. Uh-huh.</p> <p>18 Q. And I believe, you can check if you wish, that if you</p> <p>19 add those up, you get 199.5 million that the City,</p> <p>20 under the nonrestructuring proposal, would be</p> <p>21 contributing for pension contributions. Do you see</p> <p>22 that?</p> <p>23 A. Uh-huh.</p> <p>24 MR. MILLER: Object to form.</p> <p>25 Q. Okay. Then if you go to page 5, which I'm suggesting</p>	<p>1 Q. So you don't know?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Do you know -- is it correct that this is the</p> <p>4 plan that the City was in fact presenting to the</p> <p>5 people it met with at the meetings you went to on June</p> <p>6 20?</p> <p>7 A. Yes, this was the document.</p> <p>8 Q. And do you know whether it changed in any way from the</p> <p>9 terms of the proposals that were set forth in the</p> <p>10 document we referred to earlier as Exhibit C from</p> <p>11 Mr. Orr's declaration --</p> <p>12 A. As I stated earlier, I have not read the entirety of</p> <p>13 that document so I couldn't answer that.</p> <p>14 Q. So you can't say whether the City's position has</p> <p>15 changed in any way from June 14th to June 20; can you?</p> <p>16 A. I cannot at this time, no.</p> <p>17 Q. And are you aware that another presentation was made</p> <p>18 on or around September 11th, 2013 as to what the City</p> <p>19 expected to happen under the plan, under its proposal?</p> <p>20 A. I am not aware.</p> <p>21 MR. MILLER: Object to form.</p> <p>22 A. I was not --</p> <p>23 Q. Do you know as of September 11th --</p> <p>24 A. Can I answer it?</p> <p>25 Q. I'm sorry, did I cut you off?</p>
<p>1 to you is what the City is projecting under its</p> <p>2 restructuring scenario, what you will see, and you can</p> <p>3 tell me if I'm wrong, is that the only entry for</p> <p>4 pension now is sort of a little bit above the middle</p> <p>5 of the page where it says DC, defined contribution,</p> <p>6 benefit contribution for the year 2014, we now see the</p> <p>7 number 25.4 million as opposed to without the</p> <p>8 restructuring 199.5 million. Do you see that?</p> <p>9 MR. MILLER: Object to form. The document</p> <p>10 speaks for itself.</p> <p>11 A. I see the number, yeah.</p> <p>12 Q. Okay. And my understanding, you can tell me if this</p> <p>13 is consistent with yours, is that under the City's</p> <p>14 proposed restructuring as set forth in document S18</p> <p>15 that we've just been looking at, effectively the City</p> <p>16 is saying that for retirees they will stop making any</p> <p>17 pension contributions on a going forward basis and the</p> <p>18 only pension contributions they're making at all are</p> <p>19 for current employees on a -- on the plan set forth</p> <p>20 that we've just looked at on page 4, a defined</p> <p>21 contribution plan. Is that consistent with your</p> <p>22 understanding?</p> <p>23 MR. MILLER: Object to form.</p> <p>24 A. You know, I can't venture any answer with respect to</p> <p>25 these documents because this is not my forte.</p>	<p>1 A. Yes.</p> <p>2 Q. I didn't mean to.</p> <p>3 A. I was not aware of that.</p> <p>4 Q. And as regards pension benefits, which is what we've</p> <p>5 been looking at, do you know whether the plan, the</p> <p>6 proposal that was presented by the City on September</p> <p>7 11 changed in any way from what it presented first on</p> <p>8 June 14th and then again on June 20th?</p> <p>9 A. I haven't -- I'm not aware of nor have I seen a</p> <p>10 proposal that the City made on September 11.</p> <p>11 Q. So you don't know one way or the another?</p> <p>12 A. I don't.</p> <p>13 Q. Okay, fair enough.</p> <p>14 Now, is it -- to your knowledge can someone</p> <p>15 or a retiree, for example, look at the information</p> <p>16 that's contained in S18 and be able to figure out</p> <p>17 monetarily what the total impact of this proposal is</p> <p>18 on that particular individual?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay. And you think that's something that someone</p> <p>21 would want to be able to understand in order to</p> <p>22 analyze a proposal that's being made and respond</p> <p>23 intelligently to it?</p> <p>24 MR. MILLER: Object to form. Calls for</p> <p>25 speculation.</p>



<p>Page 89</p> <p>1 A. Could you rephrase that?</p> <p>2 MR. ULLMAN: Can you repeat it?</p> <p>3 (Record read back as requested.)</p> <p>4 A. What's the that?</p> <p>5 Q. Being able to understand the monetary impact to the</p> <p>6 affected individual of what is being proposed. If I</p> <p>7 were presenting you with a proposal, you would want to</p> <p>8 understand how -- a proposal that purports to affect</p> <p>9 how much money you're going to get, how many benefits</p> <p>10 you're going to receive, you would want to know what</p> <p>11 the monetary impact on you is overall in order to</p> <p>12 think about it, understand it and respond to; true?</p> <p>13 A. If it had a monetary impact and --</p> <p>14 MR. MILLER: Let me interpose an objection.</p> <p>15 Object to form.</p> <p>16 Q. You can answer the question.</p> <p>17 A. If it had a monetary impact and I had an interest in</p> <p>18 that regard, I would. If I didn't, I wouldn't.</p> <p>19 Q. Okay. Now, we talked about the June 20 meeting. What</p> <p>20 I'm going to do is show you two documents. I'm going</p> <p>21 to have them marked serially, but I'm going to show</p> <p>22 them to you at the same time and then ask you about</p> <p>23 them because they're related; okay?</p> <p>24 A. All right.</p> <p>25 MR. ULLMAN: So we're going to mark these</p>	<p>Page 91</p> <p>1 anything that's untrue that's stated in here.</p> <p>2 A. I have no reason to believe anything in here is</p> <p>3 untrue.</p> <p>4 Q. Okay. And then the follow-up letter that I'm -- and</p> <p>5 then just before I move to the follow-up letter, this</p> <p>6 letter is basically saying, is it not, that there's</p> <p>7 been a meeting scheduled for June 20 and Mr. Easley is</p> <p>8 inviting the recipient to attend; yes?</p> <p>9 A. It does.</p> <p>10 Q. And that's what led to the June meeting that you</p> <p>11 talked about before. Now let's go to Exhibit Satchel</p> <p>12 20, which is a June 17 letter.</p> <p>13 A. Uh-huh, yes.</p> <p>14 Q. And just to put the right context on this, if you turn</p> <p>15 to page 2 of this document, S20, you will see in the</p> <p>16 last paragraph this is from Steven -- is it Kreisberg?</p> <p>17 MS. LEVINE: Kreisberg.</p> <p>18 Q. -- Kreisberg writes to someone at Miller Buckfire --</p> <p>19 you know Miller Buckfire was working with the City;</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. So in the last paragraph Mr. Kreisberg says, I'm</p> <p>23 assisting AFSCME Locals and AFSCME Council 25 with</p> <p>24 issues relating to the proposal. We've been asked to</p> <p>25 meet with the EFM's representatives on Thursday.</p>
<p>Page 90</p> <p>1 as 19 and 20.</p> <p>2 (Marked Exhibit No. 19.)</p> <p>3 (Marked Exhibit No. 20.)</p> <p>4 Q. Now, the first document that I've shown you, which</p> <p>5 we've marked as Exhibit 19, is a June 14 letter to Ed</p> <p>6 McNeil from Jones Day.</p> <p>7 A. Yes.</p> <p>8 Q. Do you see that? And in fact, you're a copyee on the</p> <p>9 Exhibit Satchel 19; do you see that?</p> <p>10 A. I am.</p> <p>11 Q. Do you recognize this letter?</p> <p>12 A. I do.</p> <p>13 Q. Okay. And you actually got a copy at the time it was</p> <p>14 written?</p> <p>15 A. Did --</p> <p>16 Q. Okay.</p> <p>17 A. I did receive a copy of it.</p> <p>18 Q. Okay, and it was written by whom at Jones Day?</p> <p>19 Brian Easley?</p> <p>20 A. It was.</p> <p>21 Q. Do you have any reason to believe anything he said in</p> <p>22 here is untrue, he meaning Mr. Easley?</p> <p>23 A. I would have to read it.</p> <p>24 MR. MILLER: Object to form.</p> <p>25 Q. You can take a look and tell me if you think there's</p>	<p>Page 92</p> <p>1 Now, Thursday is the 20th; correct? I have</p> <p>2 a calendar if you want to check.</p> <p>3 A. If you say so.</p> <p>4 Q. Okay. So that would be the same June 20 meeting and</p> <p>5 Thursday was the same June 20 meeting that we were --</p> <p>6 you talked about earlier and that's referred to in the</p> <p>7 letter we just marked as Satchel 19; correct?</p> <p>8 MR. MILLER: Wait.</p> <p>9 A. I'm sorry, I was reading the document. Could you say</p> <p>10 that again?</p> <p>11 Q. I don't remember what I said.</p> <p>12 MR. ULLMAN: Can you read it back?</p> <p>13 (Record read back as requested.)</p> <p>14 A. All right, correct.</p> <p>15 Q. Okay. Now, if you look at the June 17 letter, Satchel</p> <p>16 20, what Mr. Kreisberg is saying we'd like some</p> <p>17 information; right? And he asks for four categories</p> <p>18 of information or actually five. There's more on the</p> <p>19 back on the second page; do you see that?</p> <p>20 MR. MILLER: Object to form.</p> <p>21 A. Yes, I see it.</p> <p>22 Q. And is it correct that all of this is information that</p> <p>23 pertains to issues that may be impacted under the</p> <p>24 proposal that's been put forth by the City?</p> <p>25 MR. MILLER: Object to form.</p>



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2 County of Genesee)

3 Certificate of Notary Public

4 I certify that this transcript is a complete, true and
5 correct record of the testimony of the witness held in this
6 case.

7 I also certify that prior to taking this deposition,
8 the witness was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an
10 employee of or an attorney for a party; and that I am not
11 financially interested, directly or indirectly, in the
12 matter.

13 WITNESS my hand this 20th day of September,
14 2013.

15
16
17 

18 Jeanette M. Fallon, CRR/RMR/CLR/CSR-3267

19 Certified Realtime Reporter

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